

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>09-</u>
v.	:	DATE FILED: <u>January 29, 2009</u>
RAHSAAN LAHVON FORD, a/k/a "Saan," a/k/a "Saani," NORMAN MICHAEL HAWKINS, JR., a/k/a "Tute"	:	VIOLATIONS: 18 U.S.C. § 371 (conspiracy to commit armed bank robbery - 1 count) 18 U.S.C. § 2113(d) (armed bank robbery - 1 count) 18 U.S.C. § 924(c)(1) (carrying and using a firearm during a crime of violence - 1 count) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Sovereign Bank, located at 125 South Providence Road, Media, Pennsylvania ("Sovereign Bank"), was insured by the Federal Deposit Insurance Corporation.

2. On or about December 19, 2008, defendants

RAHSAAN LAHVON FORD,
 a/k/a "Saan,"
 a/k/a "Saani," and
NORMAN MICHAEL HAWKINS, JR.,
 a/k/a "Tute,"

conspired and agreed together to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

3. It was part of the conspiracy that defendants RAHSAAN LAHVON FORD and NORMAN MICHAEL HAWKINS, JR. planned and executed a gun-point robbery of the Sovereign Bank in Media, Pennsylvania, during which they stole approximately \$78,142.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendants RAHSAAN LAHVON FORD and NORMAN MICHAEL HAWKINS, JR. committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about December 19, 2008:

1. Defendants RAHSAAN LAHVON FORD and NORMAN MICHAEL HAWKINS, JR. agreed to rob the Sovereign Bank.

2. Defendants RAHSAAN LAHVON FORD and NORMAN MICHAEL HAWKINS, JR. arranged to be driven to the general area of the Sovereign Bank by a person known to the grand jury (Person #1).

3. At about 10:00 a.m., defendants RAHSAAN LAHVON FORD and NORMAN MICHAEL HAWKINS, JR. put on dark clothing, covered their faces, and entered the Sovereign Bank. Defendant HAWKINS pointed a semiautomatic pistol at bank employees and customers and ordered them to get on the floor. Defendant FORD vaulted over the teller counter, emptied cash from various teller drawers and a bank vault, and stuffed approximately \$78,142 in cash into a plastic bag.

4. Defendants RAHSAAN LAHVON FORD and NORMAN MICHAEL HAWKINS, JR. fled from the bank towards a trolley and boarded it in an attempt to get away.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2008, in Media, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**RAHSAAN LAHVON FORD,
a/k/a "Saan,"
a/k/a "Saani," and
NORMAN MICHAEL HAWKINS, JR.,
a/k/a "Tute,"**

knowingly and unlawfully, by force and violence, and intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$78,142, from employees of the Sovereign Bank, located at 125 South Providence Road, Media, Pennsylvania, belonging to, and in the care, custody, control, and management and possession of the Sovereign Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Sovereign Bank and other persons, by use of a dangerous weapon, that is, a semiautomatic pistol.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2008, in Media, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**RAHSAAN LAHVON FORD,
a/k/a “Saan,”
a/k/a “Saani,” and
NORMAN MICHAEL HAWKINS, JR.,
a/k/a “Tute,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a Talon Industries T100 .380 caliber pistol, serial number 000571, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

**RAHSAAN LAHVON FORD,
a/k/a "Saan,"
a/k/a "Saani," and
NORMAN MICHAEL HAWKINS, JR.,
a/k/a "Tute,"**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to, a Talon Industries T100 .380 caliber pistol, serial number 000571.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

_____ **A TRUE BILL:**

_____ **FOREPERSON**

LAURIE MAGID
Acting United States Attorney_____